



contact the Medicaid tort department. Counsel had already done this. On September 26, 2024, Plaintiff's counsel received a response from Medicaid indicating that the lien amount was zero. However, Plaintiff's counsel has bills that potentially contradict this information. On October 2, 2024, counsel sent a detailed letter to Medicaid explaining the potential discrepancy. On October 15, 2024, Medicaid again confirmed that there is no lien amount.

On October 18, 2024, Jessica Bebawi, Plaintiff's counsel, called the Medicaid Tort Department and spoke with a representative named Jennifer, referring to ticket number 49760747000. Jennifer stated that she could not confirm which dates of service Medicaid had considered in response to Plaintiff's lien inquiry, despite Plaintiff's counsel second letter specifying the date range. She suggested that Plaintiff's counsel send a third letter, attaching a hospital bill. Plaintiff's counsel has done so and awaits Medicaid's response.

If Medicaid confirms that a lien exists, additional time may be required to resolve the case. In that event, Plaintiff's counsel may need to dispute certain charges and seek a reduction. Once this is resolved, Plaintiff's Mississippi guardianship counsel can proceed with petitioning the Chancery Court.

Plaintiff is unable to finalize the proposed settlement of this case on Kelly Masten's behalf without the authorization from the Chancery Court of Mississippi. Once finalized by Plaintiff, the settlement agreement will then need to be placed on the Tarrant County Commissioners Court's agenda at a regularly scheduled meeting for a vote to approve the settlement on behalf of Defendant. For context in calculating this timing, the Tarrant County Commissioners Court meets on the first and third Tuesday of the month and requires agenda submissions two weeks before the meeting date.

Respectfully submitted,

/s/Jessica Bebawi

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